

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

VICKY RODRÍGUEZ TORRES, et al.

Plaintiffs

v.

GOVERNMENT DEVELOPMENT BANK
FOR PUERTO RICO, et al.

Defendants

CIVIL No. 09-1151 (JP)

TITLE VII VIOLATIONS, AGE &
SEX DISCRIMINATION, TORTS

PLAINTIFF DEMANDS A TRIAL
BY JURY

**STATEMENT UNDER PENALTY OF
PERJURY PURSUANT TO 28 U.S.C. § 1746**

I, Ángel Pérez Rivera, of legal age, single, Private Financing Director of the Government Development Bank for Puerto Rico ("GDB"), and resident of San Juan, Puerto Rico, under penalty of perjury, pursuant to 28 U.S.C. § 1746, state and affirm as follows:

1. My personal circumstances are as previously stated.
2. In March 2003, I began working as Director of the GDB's Private Financing Department.
3. As Director of the Private Financing Department I was one of Vicky Rodríguez' ("Rodríguez") supervisors. As the Director of the Private Financing Department, my main duties and responsibilities were: (i) manage the overall portfolio risk of the Private Financing Department, (ii) manage and supervise all human resources of the Private Financing Department, including the Account Executives, and (iii) structure all new financing and present same to the Bank's Board of Directors.
4. From February 8, 2007 to June 30, 2009 I was assigned to the Puerto Rico Tourism

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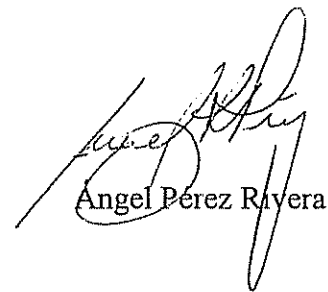
Company ("PRTC") as Director of its Incentives and Investments Division while, with the assistance of Mr. Javier Ramos, continued to manage the remaining portfolio of the Private Financing Department.

5. The following projects: PMO Hotel, LLC; PMO Condohotel and the JW Marriot Coco Beach Resort & Spa (all belonging to the Tourism Development Fund, a GDB's subsidiary) have not been settled and the parties are still negotiating its terms.

6. I never took any adverse employment action against her on the basis of her age, sex or any other protected category. Also, I had never witnessed any conduct on the part of Rodríguez' co-workers or supervisors which would lead me to believe she was being discriminated or "at risk of injury". Finally, Rodríguez herself never brought any complaint of this nature to my attention.

I, Ángel Pérez Rivera, declare under penalty of perjury under the laws of the United States of America that all of the foregoing is true and correct to the best of my personal knowledge.

WHEREFORE, I subscribe the present statement in San Juan, Puerto Rico, on this 14th day of January 2010.



Ángel Pérez Rivera